

Harvis & Fett

GABRIEL P. HARVIS
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March 16, 2017

BY ECF

Honorable Lois Bloom
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11211

Re: *Pearson v. City of New York, et al.*, 16 CV 5798 (AMD) (LB)

Your Honor:

I represent plaintiff in the above-referenced civil rights action. I write on behalf of the parties to respectfully request an extension of the deadline for the parties to file a mutual protective order from today to March 22, 2017.

Plaintiff awaits a draft of the proposed order from defendants who have indicated that they should have it prepared by early next week. If it should please the Court, the proposed extension should allow time for the parties to confer on defendants' proposal and finalize the proposed order for filing. This is the parties' first request for an extension of this deadline. The undersigned apologizes for the belated nature of this request.

Thank you for your consideration of this application.

Respectfully submitted,



Baree N. Fett

cc: Beth Hoffman, Esq.